

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION
CINCINNATI, OH

I, Chloe Kilguss, pursuant to 28 U.S.C. §1746, declare under penalty of perjury as follows:

1. I have personal knowledge of the facts stated herein.
2. I am currently employed as a Legal Administrative Assistant at Plaintiff OJPC.
3. One of my job duties is to monitor voicemails received by OJPC at the number 513-421-1108.
4. On December 10, 2024, I received a voicemail from Oscar Smith at Marion Correctional Institution reading aloud from a piece of confidential legal mail OJPC had sent to a client at MCI.
5. The voicemail stated in part, “the confidential legal mail control numbers are to be used only for legal mail. This newsletter you guys sent out: ‘the holiday season reminds us of the importance of hope.’ Those letters could have been sent via regular mail.”
6. The letter in question was a confidential communication intended for our incarcerated clients, and was duly marked as confidential legal mail and had a control number affixed to the envelope.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 11/10/2023

Chloe Kilguss

